IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ABBOTT GMBH & CO., KG,	)	
ABBOTT BIORESEARCH CENTER, INC.,	)	
AND ABBOTT BIOTECHNOLOGY LTD.,	)	C.A. No. 4:09-CV-11340 (FDS)
	)	
Plaintiffs,	)	
	)	JURY TRIAL DEMANDED
v.	)	
	)	
CENTOCOR ORTHO BIOTECH, INC. AND	)	
CENTOCOR BIOLOGICS, LLC.,	)	
	)	
Defendant.	)	

DECLARATION OF MATTHEW A. PEARSON IN SUPPORT OF DEFENDANTS' SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF

I, Matthew A. Pearson, declare and state as follows:

1.   I am counsel at the law firm Akin Gump Strauss Hauer and Feld LLP, counsel for Centocor Ortho Biotech, Inc. and Centocor Biologics, LLC, and as such I am familiar with the facts stated herein.

2.   Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Kabat, E.A., et al. "Sequences of Proteins of Immunological Interest", Vol. 1, 5th ed.

3.   Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent 6,914,128.

4.   Attached hereto as Exhibit 3 is a true and correct copy of an excerpt from U.S. application 10/912,944 bearing bates numbers COBI00626331-426.

5   Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the January 28, 2011 deposition of Michael White *(FILED UNDER SEAL)*.

6.   Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Centocor

deposition exhibit 394 bearing bates numbers ABT-IL12-03151613 & 03151780 *(FILED*

UNDER SEAL).

7.   Attached hereto as Exhibit 6 is a true and correct copy of excerpts from Centocor

deposition exhibit 393 bearing bates numbers ABT-IL12-00008423 & 00008496-8497 *(FILED*

UNDER SEAL).

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 28, 2011

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Matthew A. Pearson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Declaration of Matthew A. Pearson in Support of Defendants' Supplemental Claim Construction Brief along with exhibits cited therein was electronically mailed to the following counsel of record on March 28, 2011 through the Court's ECF notification system.

Matthew A. Pearson